

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 3:20-CR-002
	)	
LARRY BARNES, JR.,	)	
	)	
Defendant.	)	

STATEMENT OF FACTS

The United States and the defendant agree that the factual allegations contained in this Statement of Facts and in Counts Two and Three of the Superseding Indictment are true and correct, and that the United States could have proven them beyond a reasonable doubt.

1. On or about December 9, 2019, in the Eastern District of Virginia, and within the jurisdiction of this Court, the defendant, LARRY BARNES, JR., did knowingly, intentionally, and unlawfully possess with the intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

2. On or about December 9, 2019, in the Eastern District of Virginia, and within the jurisdiction of this Court, the defendant, LARRY BARNES, JR., did knowingly, intentionally, and unlawfully possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), and (b)(1)(B).

3. As a part of a drug investigation into BARNES, Jr., law enforcement performed surveillance of BARNES, Jr., and observed him travelling to and from 1215 East Main Street,

Richmond, Virginia, and 13443 Greenham Court, Chester, Virginia. During surveillance, law enforcement identified BARNES, Jr.'s actions as consistent with drug-trafficking behavior.

4. On December 9, 2019, law enforcement saw BARNES, Jr. arrive at 1215 East Main Street. BARNES, Jr. arrived alone and entered into the building with a pass code, walking by law enforcement in the building in the process.

5. Prior to BARNES, Jr. entering the elevator, he was detained by law enforcement. Law enforcement removed two phones and other items from BARNES, Jr.'s pockets and placed him in a police vehicle. He was advised of the *Miranda* rights as he was placed in the vehicle.

6. During law enforcement's execution of the search warrant on December 9, 2019, at 1215 East Main Street, they found in the kitchen a money counter, several trash bags filled with marijuana, a shopping receipt with BARNES, Jr.'s name on it, four Ziploc bags filled with cocaine, a Ziploc bag filled with heroin, and a wrapped, sealed kilogram of heroin. BARNES, Jr. identified the kilogram of heroin as such. He also stated that all of the drugs belonged to him.

7. A laboratory report confirmed that law enforcement recovered 1,049.89 grams of heroin and 936 grams of cocaine.

8. Law enforcement also found scales, U.S. Currency, and handwritten ledgers or notes in close proximity to the U.S. Currency.

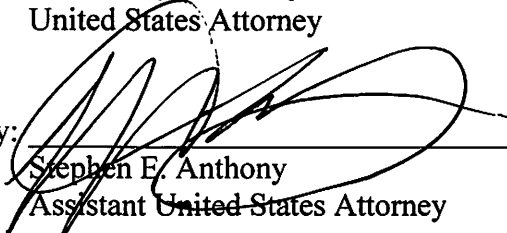
9. The actions taken by defendant as described above were taken willfully, knowingly, and with the specific intent to violate the law. Defendant did not take those actions by accident, mistake, or with the belief that they did not violate the law.

10. This statement of facts sets forth facts necessary to support defendant's plea of guilty and does not necessarily relate all facts relevant to the charged offenses or other persons who may have been involved in the offenses.

Respectfully submitted,


G. Zachary Terwilliger  
United States Attorney

By:

  
Stephen E. Anthony  
Assistant United States Attorney


I have consulted with my attorney regarding this Statement of Facts. I knowingly and voluntarily agree that each of the above-recited facts is true and correct and that had this matter gone to trial the United States could have proven each one beyond a reasonable doubt.

Date: 7-09-20

  
LARRY BARNES, JR.  
DEFENDANT

I am counsel for the defendant, LARRY BARNES, JR, I have carefully reviewed this Statement of Facts with him and to my knowledge, his decision to agree to this Statement of Facts is an informed and voluntary decision.

Date: 7-9-20

  
John Mann  
Counsel for the Defendant